their tariffs to allow carriers that prearrange for query services to avoid paying monthly non-recurring charges.[52]

As AT&T has shown in the previous LNP tariff investigations, there is simply no basis for this purportedly "nonrecurring" charge. All or virtually all customers of the SBC ILECs' "default query" services will also be purchasing exchange access from those carriers on a regular basis in order to terminate interexchange calls in their territory. SWBT and Pacific therefore in most cases already will have established an account with those carriers, and therefore should not need to impose any non-recurring charges relating to billing. In all events, there is no basis to impose this so-called "nonrecurring" charge on a monthly basis. After a carrier has been billed during one month for default LNP query service, SWBT and Pacific cannot plausibly contend that they must set up billing from scratch in each subsequent month. AT&T submits that it should be dispositive to the Commission's analysis of this issue that no other ILEC seeks to impose similar non-recurring charges -- indeed, Ameritech eliminated a similar charge from its tariff during the Commission's initial LNP tariff investigation, observing that it had identified "ways to mechanically identify and bill for default traffic."[53]

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52 SBC stated at pages 6-7 of its reply to AT&T's petition to suspend or reject its instant tariff that:

> SBC is willing to revise the tariff language to clarify that the charge will only be billed to N-1 carriers who terminate traffic onto the network of either Southwestern Bell or Pacific Bell and have not performed their querying responsibility nor prearranged with either of these entities to perform queries on the N-1 carrier's behalf.

53 See Reply Comments of Ameritech, filed February 27, 1998, p. 14 in Number Portability Query Services, CC Docket No. 98-14.

VII. THE SBC ILECS MAY NOT CHARGE FOR QUERIES UNLESS A CALL TERMINATES TO AN END OFFICE FROM WHICH AT LEAST ONE NUMBER HAS BEEN PORTED

The Designation Order rejected SBC's longstanding argument that the Commission's LNP orders require LECs to query all calls to an NXX in which number portability is available, even if no number has been ported in that NXX.[54] That order went on to instruct Pacific and SWBT to explain, as they have failed to do through two prior LNP tariff investigations, why it is necessary for them to charge for such queries, when the great majority of other ILECs do not do so.

> In the Cost Classification Order, we directed incumbent LECs to explain why it is necessary to query each call to an NXX where a number has not been ported. Our review of the tariff filings indicates that neither Pacific nor SWBT has provided an adequate explanation as to why it must query each call to a particular NXX before a number has been ported from or to that particular NXX. We therefore designate for investigation whether Pacific and SWBT's demand calculations, which include queries for calls to NXXs where a number has not been ported, are reasonable. We direct Pacific and SWBT to provide a detailed explanation as to why their systems are required to operate in this fashion and state why no other alternatives exist. Pacific and SWBT also should explain the differences between their systems and those of other LECs, such as Ameritech, that have not found it necessary to query all calls. [55]

AT&T has briefed this issue at length in prior pleadings and ex parte submissions and will not burden the record by repeating those claims here. Instead, AT&T hereby incorporates into this

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54 Designation Order, ¶ 46 ("We do not read the Third Report and Order as mandating, as SBC implies, that carriers must query all calls where number portability is available, even in NXXs where no numbers have been ported.").

55 Id., ¶ 46 (footnote omitted, emphasis added).

opposition by reference its petition to suspend the Pacific and SWBT tariffs at issue in this proceeding, together with all of the attachments thereto.[56]

The SBC ILECs argue that the five-day period from the time they receive a First Usage Notification ("FUN") message from the NPAC/SMS is not sufficient notice to permit them to open an NXX for portability.[57] Pacific and SWBT argue that they are

> aware that some incumbent local exchange carriers are opening the codes within five days after the FUN message. Under this process, however, the local exchange carrier could not perform queries for which the carriers are billed until after the five day period. In the opinion of [Pacific / SWBT], there are inherent risks in such a process related to the foreseeable inability to open the code within the time period.[58]

Noticeably absent from the SBC ILECs' argument is any evidence to support this claim. In fact, other LECs have been performing the translations at issue during this five-day window for over a year without experiencing any of the problems the SBC ILECs predict. SWBT and Pacific nowhere explain why their networks are uniquely incapable of opening an NXX for portability within the five-day window following a FUN message.

The SBC ILECs also assert that due to the work they have already performed, it would be wasteful for them now to remove the routing translations from their switches and then re-input them when they receive a FUN. Stripped of its rhetoric, this argument is nothing more than a claim that SWBT and Pacific must be permitted to gain the full benefit of their attempt to unlawfully bill other carriers for wholly unnecessary query services. Just as N-1 carriers cannot

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56 AT&T Corp., Petition To Suspend Or Reject Tariffs, filed January 21, 1999 in Long-Term Telephone Number Portability Tariff Filings, CC Docket No. 95-116.

57 See Pacific, pp. 18-19; SWBT, pp. 18-19.

58 Pacific, p. 18; SWBT, p. 17.

reasonably be forced to pay the SBC ILECs' for the patently useless "service" of launching a query before the first number ports in an NXX, they likewise cannot reasonably be required to bear SWBT's and Pacific's costs to undo the network modifications that made that misguided scheme possible. The SBC ILECs cannot possibly contend that they were not on notice that their proposed practice was contested -- AT&T and others have for many months disputed SWBT's and Pacific's plans to charge for queries before the first number ports in an NXX, and SBC has long been aware that other ILECs were conducting business differently. Further, SWBT and Pacific also had ample notice of the queries for which it was permitted to bill N-1 carriers by virtue of the Commission's repeated discussions of LNP in its prior orders.

In an attempt to bolster their claims, the SBC ILECs toss out the completely unsubstantiated claim that to now refrain from billing for unnecessary queries would cost [redacted] and take between twenty-four and twenty-six weeks.[59] Even apart from the fact that SWBT and Pacific offer nothing to support this contention, it is facially incredible. On March 2, 1999, Bell Atlantic filed an LNP tariff in which it proposed to stop billing for queries in NXXs in which no numbers had ported, ending its former practice of charging for default queries on such calls.[60] Bell Atlantic was able to make this alteration at no cost to other carriers, and to implement it within the fifteen days that elapsed between the date it filed its tariff and its March 17, 1999 effective date.

In all events, even if the SBC ILECs truly believe that they cannot now implement LNP so as to only query NXXs from which numbers have actually ported, they are

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59 Pacific, p. 19; SWBT, p. 19.

60 See Bell Atlantic Tariff F.C.C. No. 1, Transmittal No. 1111 (filed March 2, 1999) § 13.3.16(E)(1)(a).

free to conduct whatever queries they see fit. As AT&T has repeatedly stated, it does not believe that the Commission should dictate to carriers how they should introduce LNP into their networks. That uncontroversial fact does not mean, however, that those BOCs may force N-1 carriers to pay for useless queries simply for the privilege of terminating calls to their switches. Accordingly, there is simply no merit to the dire prediction that "A change in [Pacific's / SWBT's] tariff at this late date would necessitate removal of routing translations for thousands of NXXs in hundreds of switches, only to have to input and test these switches again at the time the first number ports."[61] The SBC ILECs need not alter any aspect of their LNP implementation plans except their unlawful proposal to bill other carriers for queries that have no valid purpose.

VIII. THE SBC ILECS' TARIFFS CLAIM IMPERMISSIBLE COSTS RELATING TO GENERIC UPGRADES

Paragraph 48 of the Designation Order directed the SBC ILECs to provide additional support for their claimed costs of generic upgrades.

> The Bureau's initial review of Pacific and SWBT's tariff filings reveals that the LECs have included costs for software generics, which appear to be general network upgrades, without adequate justification. .... We direct Pacific and SWBT to explain the methodology used to calculate generic upgrade costs and the allocation of costs between the number portability and non-number portability services.[62]

Pacific and SWBT responded to this instruction as follows:

> [Pacific / SWBT] adopted an approach which first discounted the total cost of generic upgrades in connection with implementing the LNP capability by an amount equal to the costs of the required generic upgrades which were contracted for prior to the Commission's Second Report and Order in CC Docket No. 95-116. Next, each switch platform was evaluated on a switch by switch basis to determine if there were any other reasons for upgrading the generic

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61 Pacific, p. 18; SWBT, p. 17.

62 Designation Order, ¶ 48 (footnote omitted).

> package other than LNP. Where another application was found to be the basis for the need to upgrade the generic software release, the total cost attributable to this particular upgrade was eliminated from consideration as an LNP-related cost.
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> ****
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> The total cost of the generic software upgrades related to each switch type, once calculated as specified above, was divided by the number of switches where LNP had either been implemented or it was anticipated LNP would be implemented within the recovery period pursuant to bona fide requests.[63]

Yet again, the SBC ILECs ignore the unambiguous requirements for determining costs to be recovered through LNP surcharge and query rates by seeking to recover expenses that would not have been incurred "but for" LNP, without regard to the "for the provision of portability" prong of the Commission's test. The LNP Cost Classification Order clearly held that the only recoverable portion of generic upgrades is the difference between the costs of the upgrades with the LNP functionality and the costs of the upgrades without that functionality.

> Several LECs have noted that hey have had to purchase "generic upgrades" for switch software. Some contend that they have purchased several versions to reach the LNP-capable version of software. As stated above, recovery for network updates is provided through the ordinary price caps and rate-of-return mechanisms. That some LECs have delayed making updates to their networks, for which a recovery mechanism has already been provided, does not authorize them to recover those costs now through the federal LNP charges. The Third Report and Order expressly provides that only the incremental portion of the costs of generic upgrades due to LNP functions are eligible LNP costs. As noted above, only the difference between the costs of the upgrades without the LNP functionality and the total cost of the upgrades with the LNP functionality is an eligible LNP cost.[64]

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63 Pacific, pp. 20-21; SWBT pp. 19-20 (emphasis added).

64 Designation Order, ¶ 27 (emphasis added).

The SBC ILECs' cost calculations also include the costs of hardware upgrades necessary to run the generic software upgrades they claim and to provide additional memory capacity.[65] The costs of such processor upgrades should not be included in LNP tariffs in this fashion because, like generic software upgrades, switch manufacturers typically require processor upgrades for a wide variety of reasons and they benefit all users and services on the switch. It is clearly inappropriate to assign all of the costs of such an upgrade to LNP.

IX. AMERITECH AND THE SBC ILECS' SHOULD REMOVE LNP-RELATED CHARGES AND ANY ASSOCIATED REVENUES FROM THEIR INTRASTATE INVESTMENTS AND EXPENSES

The Designation Order also directed Ameritech and the SBC ILECs to

> file an explanation of how prior year costs related to long-term number portability implementation were treated with respect to jurisdictional separations. The LECs should demonstrate that the long-term number portability costs booked in past periods and included in the development of federal number portability charges have not been recovered already in the state jurisdiction. Alternatively, the LECs should explain how state ratepayers will be made whole if the Commission allows federal recovery of costs previously assigned to the intrastate jurisdiction and included in the state ratemaking process. We also direct the LECs to file an explanation of how costs related to long-term number portability implementation will be treated prospectively with respect to jurisdictional separations. The LECs should demonstrate that long-term number portability costs included in the development of federal number portability charges will not be recovered prospectively in the state jurisdiction.[66]

Pacific and SWBT stated in their direct cases that:

> Since the federal cost recovery mechanism for Pacific/Southwestern Bell did not commence until February 1, 1999, the LNP costs were not excluded from the separations process prior to that date.[67]

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65 See Pacific, Attachment H; SWBT, p. 20 & Attachment H

66 Designation Order, ¶ 51.

67 Pacific, p. 21; SWBT, p. 21.

This explanation, however, is not adequate to dispose of this issue.

The Commission's LNP Cost Recovery Order clearly held that long-term number portability costs and recoveries are exclusively federal and must be excluded from jurisdictional separations.

> [W]e find that section 251(e)(2) authorizes the Commission to provide the distribution and recovery mechanism for all the costs of providing long-term number portability. We conclude that an exclusively federal recovery mechanism for long-term number portability will enable the Commission to satisfy most directly its competitive neutrality mandate, and will minimize the administrative and enforcement difficulties that might arise were jurisdiction over long-term number portability divided. Further, such an approach obviates the need for state allocation of the shared costs of the regional databases, a task that would likely be complicated by the databases' multistate nature. Under the exclusively federal number portability cost recovery mechanism, incumbent LECs' number portability costs will not be subject to jurisdictional separations. Instead, we will allow incumbent LECs to recover their costs pursuant to requirements we establish in this Third Report and Order.[68]

The above ruling nowhere suggests that ILECs could wait until February 1999 to begin removing the LNP charges from the intrastate jurisdiction. Indeed, the only significance of the February 1, 1999 date is that it is the date on which the Commission first allowed ILECs to bill LNP surcharges.

The only explanation Pacific or SWBT provide for continuing to include LNP-related items in their separations process until February 1999 is that neither company filed for any new rate hearings in 1997 or 1998, and so the costs of these charges were not included in their rate calculations. However, even if the SBC ILECs made no general rate filings in 1997 or 1998, those carriers nevertheless should make the necessary adjustments to remove these charges and any associated revenues from their intrastate investments and expenses. Future intrastate rate cases may make use of historical investments and expenses, and the SBC ILECs' intrastate

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[68] LNP Cost Recovery Order, ¶ 29.

figures are currently overstated by virtue of their inclusion of LNP-related costs. SWBT and Pacific should make the appropriate accounting adjustments in order to improve the accuracy of their reported intrastate results.

Ameritech states that it

> began incurring LNP costs in 1997. At and since that time, Ameritech has been under price cap regulation in the federal jurisdiction, and alternative regulation has been in place in all five of its state jurisdictions for at least 2 years. Since Ameritech has not taken any exogenous adjustments for LNP during that period, no existing state rate could have been increased to recover LNP costs.[69]

As shown above, the LNP Cost Recovery Order held that long-term LNP costs and recoveries are exclusively federal and must be excluded from jurisdictional separations. Even if no general rate filings occurred in 1997 or 1998, Ameritech should make the appropriate accounting adjustments to remove these charges and any associated revenues from their intrastate investments and expenses.

X. GTE HAS FAILED TO CORRECT ITS USE OF INFLATION FACTORS

Paragraph 8 of the Designation Order observes that "[i]n their confidential cost support, GSTC and GTOC appear to have miscalculated their costs by improperly inflating expenditures anticipated after 1999." In its February 25, 1999 filing, GTE sought to correct the inflation factors it used for post-1999 expenditures by adopting the factors shown below:[70]

YEAR	FACTOR
1999	2.0%

[69] Ameritech, p. 27.

[70] GTE also applied these factors to its NPAC/SMS expenses. These costs are fixed by the contracts between the regional Limited Liability Corporations ("LLCs") and the NPAC/SMS vendor, Lockheed-Martin, through the year 2003. There is no clause in these contracts that permits fee increases due to inflation during the initial term of this contract, and GTE's upward adjustment of those costs accordingly is unwarranted.

2000	2.3 %
2001	2.3%
2002	2.4%
2003	2.5%

The above factors do not accurately depict the true costs that GTE will incur and should be removed from its calculations. The telecommunications industry and the Commission have long recognized that upward pressure on costs due to inflation is offset by productivity gains. Included in the ILECs' rate filings each year is a productivity factor that is based on anticipated cost savings due to productivity gains less any overall inflation impact. For GTE, this "X factor" currently is 6.5%. The other ILEC LNP tariffs filed to date have recognized that there is no grounds to adjust projected investment and cost figures for inflation. Indeed, given that GTE's "X factor" exceeds its projected inflation rates, any adjustment to proposed future ILEC LNP related costs should reduce, rather than increase, its real expenditures.

XI. LECS MAY NOT IMPOSE LNP SURCHARGES ON CMRS PROVIDERS THAT UTILIZE TYPE 1 INTERCONNECTION TRUNKS

The Personal Communications Industry Association and Arch Communications (collectively, "PCIA") recently filed a petition for reconsideration of the Designation Order on the ground that Ameritech improperly has billed LNP surcharges to CMRS providers that utilize Type 1 interconnection trunks.[71] AT&T Wireless Services has received similar billings from Ameritech and, like PCIA, had no basis to assume that Ameritech would seek to impose such unlawful charges until after its tariff became effective. For the reasons stated in PCIA's petition, which AT&T hereby incorporates in its entirety into this pleading by reference, CMRS carriers

[71] See Personal Communications Industry Association and Arch Communications, Petition For Partial Reconsideration Of Order Designating Issues For Investigation, in Long-Term

(footnote continued on next page)

using Type 1 trunks are not among the classes of end users or carriers that are subject to LNP surcharges under the Commission's rules and orders. The Commission should prohibit ILECs from imposing LNP surcharges on CMRS carriers purchasing Type 1 trunks, and should require that any such charges imposed to date be refunded with appropriate interest.[72]

(footnote continued from previous page)

Telephone Number Portability Tariff Filings, CC Docket No. 99-35, filed March 26, 1999.

72 See id., pp. 5-9. Because the Commission suspended Ameritech's tariff (and all the tariffs at issue in this proceeding) for one day before permitting it take effect, there can be no argument that it is now improper to require Ameritech to cease imposing the disputed charges and to refund those that it has collected to date. See generally Report and Order, Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996, CC Docket No. 96-187, FCC 97-23 (released January 31, 1997), ¶ 21. Moreover, Ameritech should not be heard to complain that it has not been afforded adequate opportunity to offer its own arguments on this issue, as it could have responded to PCIA's petition and can now address this argument in its reply in the instant proceeding, if it wishes to do so.

CONCLUSION

The Commission should resolve the legal and factual issues addressed in the instant pleading in accord with the arguments offered herein, and should prescribe LNP surcharge query rates for each of the tariffs at issue in this proceeding in accord with those rulings. In addition, the Commission should order that the unlawful charges imposed to date be refunded with interest.

Respectfully submitted,

AT&T CORP.

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April 19, 1999

Exhibit 1

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Advanced Service Assurance Verification Platform/ Service Assurance Voice System (ASAVP/ SAVS)/ Ordering, provisioning and repair	For ported TNs, modified to use the Location Routing Number (LRN) assigned in the Local Service Management System (LSMS) in place of the NPA-NXX to access the correct switch when verifying that an LNP service order was provisioned correctly	Verifies that completed service orders have been provisioned correctly, by accessing the central office switch and comparing what is provisioned on the switch to what is specified on the service order. (Note: Used by both ordering/provisioning and repair.). These changes are necessary for the system to use the LRN to access the switch to verify service order completion when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering, provisioning and repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Business Express (BEX)/ Ordering and Provisioning	Modified to use the LRN of a ported number instead of NPA-NXX to identify the proper serving switch.	Prices, configures, and quotes any GTE product. These changes are necessary to ensure that the identification of service availability is correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Desktop, Doc and Reference (DDR) Ordering and Provisioning	Modified so that it provides information at order time regarding LNP capability in a switch, so that the Local Service Request (LSR) or order requesting number portability can be validated and processed.	On-line reference tool with components for providing documentation for systems, GTE practices and procedures, and news applicable to the customer contact associate. These changes support the ability to port a TN from one LEC to another, by ensuring that customer contact reference tools used for verification of LNP capability are correct.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Enhanced 911 (E911) Ordering and Provisioning	Modifications to the E911 extract from completed service orders. This modification creates new transactions to "unlock" E911 records for ported out numbers, and to "migrate" 911 records to the new Service Provider on ported in TNs.	Emergency service support that provides emergency service numbers to a public service answering point (PSAP) with valid service addresses and generates route changes to the telephone company switch to ensure correct routing. These changes ensure that the end user's information is not deleted from the 911 database during the porting process.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Mechanized Assignment and Record Keeping (MARK) Ordering and Provisioning	Provides for new status of ported TNs so that non-native TNs will age and be returned to the donor switch, while native number can be returned to inventory upon disconnect at the new service provider. Also sets/deletes the Ten Digit Trigger that is required by LNP for seamless provisioning between service providers. Allows non-native TNs to be assigned in a switch.	The GEIS product that provides automated facility management and record administration system for Inside and Outside Plant. MARK manages the GTE TNs inventory. The MARK system also provides data to the service order entry process, creates and delivers recent changes to the switch, and performs street address maintenance. These changes are necessary to ensure that TNs inventories are correctly assigned, aged, identified and returned to original code holders.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
National Order Collection Vehicle (NOCV) Ordering and Provisioning	The system changes accept and process non-native TNs with their associated LRN.	One of three GTE Network Services order entry systems, NOCV provides online capability to create and modify Service Orders. It also provides offline processing and activation of the service orders created. These changes are necessary to ensure that customer-requested LNP service orders are properly routed, according to NANC standards.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Service Order Loading and Retrieval (SOLAR) Ordering and Provisioning	The system changes accept and process non-native TNs with their associated LRN.	SOLAR is an online order entry system for installing, changing, or discontinuing services. It also provides off-line processing of the Service Orders created, for interfacing with other systems such as the inventory management systems. These changes are necessary to ensure that customer-requested LNP service orders are properly routed, according to NANC standards, allowing porting to occur as committed	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Service Order Record Computer Entry System (SORCES) Ordering and Provisioning	Allows service orders to be processed according to the NANC industry-defined flow for number portability. It accepts and stores LNP information, e.g., LRN.	SORCES is composed of both online and offline systems. It provides online capability to create, modify, and cancel service orders. Customer specific information can be accessed. SORCES provides online retrieval by TNs; service orders can be retrieved by service name, address, TNs, and order number. These changes are necessary to ensure that customer-requested LNP service orders are properly handled, according to NANC standards, allowing porting to occur as committed.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Subscription Services Ordering and Provisioning	Associates a non-native ported TNs with an LRN, so that ported non-native TNs can be PIC' d to carriers associated with the serving switch. It also provides new information regarding porting activity to other carrier.	Subscription Services maintains the GTE Network Services customers' carrier selections (PIC). These changes are necessary to ensure that a customer' s selection of a long distance carrier is correctly associated with a ported number.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
4TEL® Ordering, Repair and Provisioning	Provides the ability to perform loop tests on non-native TNs. 4TEL will use the LRN associated with the ported TNs to identify the serving switch before initiating a loop test.	The 4TEL system, a Teradyne product, performs routine and demand tests on subscriber local loops. The system contains voice response and patterning features and produces reports and repair ticket information where the test parameters are exceeded. These changes are used in the *ordering/ provisioning process* at the completion of service orders for ported numbers, to verify that the service was provisioned correctly. These changes are used as well as the *repair process,* to perform existing loop testing for ported TNs on completion of trouble tickets.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering, repair and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Automated Work Admin System (AWAS) Ordering, Repair and Provisioning	Provides and processes additional LNP information (e.g., LRN) on service orders distributed to technicians	AWAS assigns work to GTE Network Services Customer Zone Technicians (CZT) and Central Office (CO) Technicians. These changes are necessary to ensure that a service order is correctly assigned to field and CO technicians when ported numbers are involved, as part of the *ordering/provisioning* process. These changes are also used in the *repair process*, to assign a trouble ticket to the correct field location for ported TNs.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Customer Care (Care) Repair	Modifies screens, tables, and interfaces to provide the information (e.g., LRN, LSPID) regarding the port status of TNs within the LSMS. Uses LRN to identify serving switch of a ported TNs so that existing repair functions can be properly applied. Changes the automated routing of trouble tickets based on port status information received from the LSMS and NPAC download. Performs trouble isolation and analysis for TNs that have been ported.	Care provides single desktop access to many support systems for the repair center advocate. An automated testing facility component automatically retrieves and reviews pending trouble tickets and initiates a local loop test. These changes allow for repairing of ported TNs in the *repair process,* in that they ensure that ported numbers are properly identified with the serving switch.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 1 -- GTE OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Computer Telephony Integration (CTI)/ Interactive Voice Response Unit (IVRU) Repair	Changes support the look-up of numbers in LSMS to determine if end user is served by GTE, and modifies windows to display LSMS information. Modifies IVRU scripts to address ported TNs (e.g., advise customer who ported out to contact current service provider).	CTI refers to a system group that interfaces with Automatic Call Distributor/IVRU (ACD/IVRU) facilities and workstations to provide the agent with the information collected from the customer during an IVRU session. The changes are necessary to the *repair process* to ensure that the IVRU correctly handles ported numbers.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Digital Services Test System (DSTS) Repair	For ported numbers, DSTS queries the LSMS to obtain the LRN to identify the correct central office switch to access for testing purposes.	DSTS is an expert system that provides repair technicians and Care center personnel the ability to test and isolate faults on digital services such as ISDN and ADSL. These changes are necessary to ensure proper maintenance of digital services when TNs are ported, as part of the *repair process.*	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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Network Operation Center (NOC)/ Trouble Admin System (TAS) Interface Repair	Modifications allow the NOC LNP support staff to receive and process the LNP trouble ticket. Provides LNP information to work group that is involved in trouble flow of individual trouble tickets only for LNP-related trouble. New interface in the *repair process* required for LNP in order to continue to achieve existing service quality standards.	A new LNP interface that provides an electronic means of passing trouble ticket information to LNP support staff at the NOC once the trouble has been isolated to the network. These changes are necessary to ensure that trouble tickets are correct and routed in a timely manner when TNs are ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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SITES Repair and Monitoring	For ported TNs, SITES accepts the LRN and uses it to identify the serving switch. The LRN is also used to determine the correct distribution for trouble tickets as part of the *repair process.*	SITES is a centralized repository that contains critical statistics for every GTE common language identity code (CLLI) site. These changes are necessary to ensure that ported number and serving switch information is correctly contained in a central repository for use by other systems in the *repair* and *monitoring processes.*	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing network repair and monitoring system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Switch Access Manager (SAM) Ordering, Repair and Provisioning	Access the LSMS to identify the LRN on port-capable NPA NXXs. Provide access to network elements that contain ported TNs based on the LRN. The modifications provide access to serving switch to perform recent change activity during service order processing for ported numbers and use LRN to access the serving switch to verify features that are active in the switch.	SAM provides access to the switch network technology for all authorized users to perform recent change activity and to verify features that are active in the switch. The changes are necessary to ensure correct identification of ported numbers and the appropriate serving switch when TNs are ported	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering, repair and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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STARMEM Ordering, Repair and Provisioning	Adds the ability to query the LSMS to determine the serving switch for a ported TNs. Uses the LRN to access switch information for ported TNs.	StarMem, provides an automatic comparison of information on the service order to features programmed into the switch. This enables the Care technician to determine the modifications required to synchronize the customer's records with requested products, services and PIC. These changes are necessary to ensure that ported TNs and associated LRNs are correctly identified. These changes ensure that the correct switch is updated during the *ordering/ provisioning process* by using LRN to identify serving switch for ported TNs. These changes are also used in the *repair process* when an advocate must access the serving switch of a ported TNs to correct the switch programming. The changes ensure that the correct switch is updated by using LRN to identify serving switch.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an existing ordering, repair and provisioning system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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TONICS Alarm Correlation Engine (ACE) Network Monitoring	This alarm correlation capability will reduce, over a period of time, the large volume of alarm events processed through TONICS to the NOC network monitoring staff. The system is being enhanced to manage ported numbers, to provide the ability to correlate line-level faults to the associated customers affected by these faults, ensuring quality of service and time to restore.	ACE is a client/sever application that performs alarm correlation of network switching data to detect equipment degradation before it becomes service affecting. Alarm correlation refers to intelligent interpretation of multiple alarms from a variety of sources including network elements and critical OSS. TONICS-ACE translates multiple alarm events into a single derived alarm requiring action. These changes are part of the *network monitoring process.*	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to an network monitoring system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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TONICS for Customer Access Facilities (TCAF) Repair	For ported TNs, TCAF determines the LRN for a CLLI (switch) and uses that to initiate a 4TEL test.	TCAF analyzes switch messages to determine if a CAF fault exists. TCAF can request demand test via 4TEL or internal diagnostics on a suspect line. A pattern trouble ticket is created and dispatched to a technician once three cases of trouble are reported on the same 25-pair complement. These changes are necessary to ensure that ported numbers and associated LRNs are correctly identified.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a network monitoring system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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Trouble Admin System (TAS) Repair	Provides the ability to query the LSMS regarding the status of a ported number, and stores the information regarding ported TNs on the trouble ticket. Added new trouble resolution codes to reflect the source of trouble regarding ported TNs (e.g., NPAC download failure). Allows use of the LRN to identify serving switch of a non-native TNs.	TAS automates the creation and flow of Trouble Reports (for TNs and circuits) through closure. Provides supervisory "queue" functions enabling tracking of individual and DAC/Care Centers. These changes, part of the *repair process,* are necessary to ensure that trouble reports are correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a repair system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Bill inquiry, Voucher and Treatment (BVT) Payments and Adjustments	Provides information regarding ported TNs and customer port status that appears on the end user bill. These changes, part of the *payment/adjustment process*, allow for adjustments to be identified and processed for ported TNs.	An on-line and batch application that provides a current representation of the customers bill, payment data and treatment status allowing the customer contact service representative to service the customer utilizing the most current data possible. BVT performs on-line retrieval of the customer bill for adjustment, voucher creation, and treatment. These changes are necessary to ensure that customer bill, payment and related information is correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a payment and adjustments system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
GTE Security Admin System (GSAS) / Security Toll Online Message Processing System (STOMPS) Fraud and Security	Accepts and processes LNP data on billing file input. Allows fraud determination logic to use LRN when necessary. Provide access to number portability information (service provider, effective date, LRN, etc.) for ported TNs in response to a court order or subpoena. Changes allow *fraud and security processes* to process ported TNs.	GSAS/STOMPS automates the process of investigating toll fraud, subscription fraud, prison fraud and Amigo fraud. The system provides the ability to enter, track and monitor suspects and restitution if convicted. These changes are necessary to ensure that fraud protections and investigations are correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a fraud and security system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Network Profile System (NPS) Payment and Adjustments	Accepts and processes LNP data on billing file input. Identifies LRN and native/non-native TNs attributes for use in revenue assignment. Changes adjust *payment/adjustment processes* to reflect ported TNs.	NPS provides data that is passed to the financial system for general ledger booking activity and financial reporting. NPS also provides analysis support through the interface extract function, which enables the user to gather customer, line, and equipment data, messages, and minutes of use, for traffic studies. These changes allow proper financial, accounting and management reporting of revenues regarding ported TNs.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a payment and adjustments system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Other Carrier Settlement System (OCSS) Settlements	Changes the *settlement process* to handle ported TNs. Accepts and processes LNP data on billing file input. Modifies logic to direct settlements to proper carrier based on porting activity according to industry standards.	OCSS provides file receipt and settlement reports to the non-AT& T carriers. OCSS tracks Invoice ready and Casual User revenue that GTE will collect for all non-AT&T carriers. These changes allow for proper carrier revenue settlements based on billing of ported TNs. The changes are necessary to ensure that settlements are correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a settlements system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Secure Integrated Gateway System (SIGS) Ordering, billing and provisioning	Modified to capture LNP information (service provider ID, effective date, etc.) from LSMS to local table for all ported TNs, for processing within the Billing systems, e.g., to screen usage data. Changes allow *usage process* to properly accept/reject usage for ported TNs.	SIGS is an application that captures ownership information regarding end user accounts and TNs for processing in ordering and billing systems. (Note: used by both ordering/provisioning and billing.) These changes are necessary to ensure correct ownership information in billing of services when a TNs is ported.	GTE claims system relates to porting numbers between carriers. See comments.	GTE claims modifications are required to identify ownership of ported numbers for ordering, provisioning and billing. Updates to allow GTE to screen usage data are changes to a provisioning and billing system. incidental to the provision of portability and are not recoverable. Such modifications to "adapt other systems to implement number portability" are not "for the provision of" LNP.

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Application/ Functional Area	Modifications GTE Contends Were Required	System Function / Explanation Offered by GTE	Relation to Porting TNs or Performing Queries	AT&T Comments
Toll Error Message Processing On-Line (TEMPO) Billing	Process new LNP related error messages associated with ported TNs. Changes allow *usage process* to reflect information regarding ported TNs.	TEMPO provides an efficient means of investigating and correcting all toll messages, which err during the CBSS usage processing. These changes are necessary to ensure that erred toll messages are correctly handled when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a billing system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Usage Messaging System (UMS) Billing	Processes new AMA record formats that were implemented with LNP, and adds LRN where needed. Provides logic to interrogate LSMS information to identify service provider for ported TNs. Changed *usage process* to reflect new information regarding ported TNs.	UMS processes usage billing data from the GTE switching environment (1350 sites). It retrieves, formats, conditions, validates, edits, screens, provides error correction and aggregates usage for down stream billing systems. It forwards inter-LATA toll to proper carrier. The changes are necessary to ensure that usage records are correct when a TNs is ported.	Per GTE, system does not relate to either porting numbers or performing queries.	As GTE admits, the claimed modifications do not relate to either performing queries or porting numbers between carriers. Instead, they involve changes made to a billing system to allow the system to recognize the ability to port numbers. The modifications to the existing system may not have been made "but for" LNP. However the modifications are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

Exhibit 2

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Exhibit 3

AT&T Exhibit 3 -- Ameritech OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications Ameritech Asserts Were Required	System Function / Explanation	Ameritech Rationale for Cost Recovery	AT&T Comments
Predictor/ Maintenance	New software required to accept LNP information	Maintenance system provides mechanized means of identifying cable pair associated with each Telephone Number (TN). Also provides real-time method for technicians to verify features associated with each TN. Prior to modification, Predictor was incapable of accepting the new LNP information.	System requires the ability to identify the facilities associated with TNs.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing maintenance system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
CARE/ Provisioning	New software required to accept LNP information.	CARE is a database of customer records that identifies what Primary Interexchange Carrier is associated with a particular TN. LNP made necessary the capability to handle non-Ameritech telephone numbers. The additional capability to maintain numbers that port from Ameritech was also developed.	System requires the ability to identify the PIC associated with TNs.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
FIRST/ Provisioning	New software required to accept LNP information.	FIRST is a mechanized tool which mechanically intercepts service orders for assistance in the resolution of error conditions occurring in the provisioning process. FIRST is an artificial intelligence system that supports downstream facilities records maintenance and audit systems.	System requires the ability to identify the number portability codes on service orders.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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DBAS II/ Billing	New software makes carrier ownership at the individual TN level of detail available for LNP functionality	This is the system that updates Ameritech's LIDB database with calling card and bill to third party validation information. With LNP, LIDBs need an additional field to store carrier information on carrier ID for the validating number. Previously this system could only identify the carrier by NPA-NXX. LNP requires identification based on all ten digits.	System requires the ability to identify the carrier associated with TNs.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing billing system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
EMAC/ Provisioning	Replacement of EMAC with provisioning systems DSF and SWITCH for LNP provisioning and maint processing.	Enhanced Mechanized Assignment and Control System; inventories and assigns inside and outside plant facilities for Wisconsin. This system stores information regarding both internal and external facilities (e.g. cable pairs and switching equipment) assigned to a customer's service. EMAC was not able to support LNP functionality.	System requires the ability to track facilities associated with TNs.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
LIDB/ Billing	Add new field to identify the billing service provider associated w/ each number.	Keeps calling card and 3rd party billing information LIDB is a regional database accessed via Operator Services systems to validate calling card, bill to third party and collect billed interLATA messages. LIDB required an upgrade to house and interpret new information required for validation and billing in an LNP environment.	Functionality is required for porting between carriers.	Contrary to Ameritech's claims, modifications do not relate to porting numbers between carriers, or to performing queries. Instead, they involve changes made to an existing billing system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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Loop Maintenance Operating System Mechanized Loop Testing LMOS/MLT Maintenance	Upgrade to the application software.	LMOS stores line record information by TN. Repair centers issue trouble reports via LMOS, which also keep a history and tracks repair status. LMOS processes and administers trouble reports for POTS residential service centers. The system mechanizes maintenance center customer line records to eliminate the need for repair personnel and produces management reports on problems. MLT performs automated loop testing of POTS lines.	System requires the ability to keep line records by these TNs.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing maintenance system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Network and Services Database (NSDB)/ Provisioning and Maintenance	... both allow for creation and/ or deletion of a new or existing record and enable LNP fields to be added, stored and/or updated.	Provides info for each TN on order activity, associated facilities, billing and services. Linked to WFA/C. NSDB is a database for certain circuit operations systems. It contains information on circuit numbers, location, etc., to be accessed by maintenance and alarm systems. The database creates the in-effect and pending circuit detail and circuit layout information data layer for downstream provisioning systems. Creation of records of Ported TNs in NSDB permits the NSDB to maintain NSDB and WFA/C integrity.	This functionality is required for porting between carriers.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing maintenance and provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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SWITCH/ Provisioning	New software interface between SWITCH and SOAC to broadcast orders	Inventories and assigns inside plant facilities. Ameritech's Telephone Number Inventory Database. This is a system designed to inventory and assign central office switching equipment and related facilities and equipment. LNP-driven modifications permit SWITCH to indicate, track and inventory ported telephone numbers.	Required for porting between carriers. Also supports the LNP query in providing network routing information to the NPAC SMS for each ported TN.	Updates required to provide routing information to the NPAC may be related to providing LNP. Updates to existing systems to recognize ported numbers are made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
Work Force Admin/ Control/ Dispatch in/ Dispatch out WFA/C/DI/ DO Provisioning and Maintenance	Enhance NSDB-WFA/ C to receive, process, store and pass LNP indicators... to retrieve and pass LNP indicators (DI/DO)... to receive and process new porting indicators.	Used to issue trouble tickets for the inside central office forces and for special services. Tracks repair progress and maintains a history. WFA provides the functionality to administer and control all installation and maintenance work functions associated with special services, message, carrier and POTS services for respective control center environments. WFA also performs workload balancing and time reporting functions. The LNP-related modifications to WFA included changes to WFA/DO, SOAC, NSDB, WFA/C and WFA/DI software and interfaces to receive and process new porting indicators.	System requires the ability to identify the state of these TNs. This functionality is required for porting between carriers.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing maintenance and provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

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MARCH/ Provisioning	New LNP fields required to be interpreted from service order on a 10 digit basis.	Mechanized translations interface from SOAC to input TN line translations directly from the Service Order into switch Platforms. March is a memory administration system that translates service order data into recent change messages and transmits them into SWITCH memory. As such, it places porting information into Ameritech end-office switches. Upgrades to MARCH were required to allow the system to recognize ported codes, and to permit creation of appropriate switch translations.	This functionality is required for porting between carriers.	Contrary to Ameritech's claims, modifications do not relate to porting numbers between carriers, or to performing queries. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.
911/ Provisioning	Software database enhancement to recognize LNP orders.	Ameritech's Emergency Services Database. As a result of LNP deployment, Ameritech's 911 database required the capability to recognize a service order as LNP-related and not as a disconnected TN.	This functionality is required for porting between carriers.	Contrary to Ameritech's claims, modifications do not relate to porting numbers between carriers, or to performing queries. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

AT&T Exhibit 3 -- Ameritech OSS Costs Improperly Included In Its LNP Tariff

Application/ Functional Area	Modifications Ameritech Asserts Were Required	System Function / Explanation	Ameritech Rationale for Cost Recovery	AT&T Comments
MYNAH/ PAWS/ Provisioning	New LNP scripting program to search for LNP orders and alert affected work centers of their presence.	Distribution system for service orders that require some level of manual assistance. PAWS is a software package allowing for an integrated approach to multi-function work stations. It also allows multiple application sites to participate in a single work station transaction. Certain account and/or circuit types require special handling in work centers not normally involved with LNP	System requires the ability to recognize LNP service order codes.	Modifications do not relate to performing queries or porting numbers between carriers. Instead, they involve changes made to an existing provisioning system to allow system to recognize ported numbers. Modifications to the existing system may not have been made "but for" LNP, but were made to "adapt other systems to implement number portability" and therefore, are not "for the provision of" LNP.

CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 19th day of April, 1999, a copy of the foregoing "AT&T Corp. Opposition to Direct Cases" was mailed by U.S. first class mail, postage prepaid, and sent via facsimile to the parties listed below:

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April 19, 1999

* Sent by e-mail in lieu of facsimile, at GTE's request